



Todd A. Spodek, Esq.  
Direct Dial: (347) 292-8633  
ts@spodeklawgroup.com

MEMO ENDORSED

6/14/22

June 10, 2022

**BY ECF:**

Hon. Colleen McMahon  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

CASE Adjourned to  
SEPT. 28, 2022 at 2PM.  
Time Excluded through  
SEPT. 28, in the interest  
of justice, to facilitate  
plea discussions.

RE: United States v. Amir Bruno Elmaani  
Case No.: 1:20-cr-00661-1 (CM)  
First Request for Adjournment of Status Conference

Dear Judge McMahon:

Please be advised that Spodek Law Group P.C. represents **Amir Bruno Elmaani**, the Defendant in the above-referenced matter.

We are currently scheduled to appear before Your Honor on June 15, 2022, at 2:00 PM for a decision on motions and a status conference. The defense has not filed any motions in this matter.

On June 15, 2022, when this matter is scheduled, I am scheduled to appear in United States v. Mandeep Singh, for sentencing, before the Honorable Geoffrey W. Crawford in the District of Vermont, under Case No.: 5:20-cr-00098-1 (GWC).

I am also scheduled to begin jury selection in People v. Jose Santana, in Bronx County Supreme Court before the Honorable Laurence E. Busching, under Ind. No.: 01784-2018 on July 18, 2022. The trial is expected to last at least two (2) weeks.

Further, the Government and I are discussing a possible pretrial resolution. I respectfully request that this matter be adjourned to any date in August or September, or anytime convenient to the Court. I consent to the exclusion of time until the next court date.

Lastly, I conferenced my request with AUSA Margaret Graham and the Government has no objection.

Hon. Colleen McMahon, *District Court Judge*  
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Thank you for your consideration.

Sincerely,

**Spodek Law Group P.C.**  
/S/ Todd A. Spodek

TS/az

cc: All Counsel (By ECF).